UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

----- x MERYL BRODSKY AND ELECT MERYL BRODSKY

TO THE NEW YORK CITY COUNCIL 2005,

Plaintiffs,

NOTICE OF MOTION TO DISMISS

15 Civ. 3469 (GBD)(DCF)

-against-

ZACHARY W. CARTER, CORPORATION COUNSEL FOR THE CITY OF NEW YORK, ON BEHALF OF THE NEW YORK CITY CAMPAIGN FINANCE BOARD,

Defendant. ----- x

PLEASE TAKE NOTICE that upon the accompanying memorandum of law in support of its motion, Defendant "Zachary W. Carter, Corporation Counsel for the City of New York, on behalf of the New York City Campaign Finance Board" ("Defendant"), by its attorney, Zachary W. Carter, Corporation Counsel of the City of New York, will move this Court before the Honorable Debra C. Freeman at the United States District Courthouse for the Southern District of New York, Daniel Patrick Moynihan, United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, granting Defendant's motion and dismissing all claims against Defendant in their entirety, and granting Defendant such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, are to be served on the undersigned on or before September 21, 2015, and reply papers are to be served within two weeks of receipt of opposition papers.

Dated: New York, New York August 20, 2015 ZACHARY W. CARTER Corporation Counsel of the City of New York Attorney for Defendant 100 Church Street, Room 2-192 New York, New York 10007 Tel: (212) 356-0893

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By: s/_____s/___ Carolyn E. Kruk (CK8297) Assistant Corporation Counsel

To: via first class mail

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